

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

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Federal Communications Commission  
Office of Secretary

Administration of the  
North American Numbering Plan

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CC Docket No. 92-237

COMMENTS OF THE  
NATIONAL TELEPHONE ASSOCIATION

The National Telephone Association ("NTCA") files these comments in response to the Public Notice in this docket released on May 19, 1997 (DA 97-1055). The Notice requests comments on the North American Numbering Council's ("NANC") recommendations for the appointment of a Numbering Plan Administration and Billing and Collection Agent ("BCA"). NTCA's comments are limited to the recommendation of BCA.

INTRODUCTION

NTCA is a national association of approximately 500 local exchange carriers ("LECs"). These LECs provide telecommunications services to end users and interexchange carriers throughout rural and small-town America. Most participate in pools administered by the National Exchange Carriers Association ("NECA") and are familiar with its expertise and reputation for competent administration of the Telecommunications Relay Services Fund as well as existing mechanisms for administration of the universal service mechanisms.

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## DISCUSSION

NTCA supports the NANC recommendation for the appointment of the National Exchange Carriers Association (“NECA”) as the BCA. NECA clearly has the experience and expertise to perform the billing and collection functions associated with recovering the costs of North American Numbering Plan Administration.

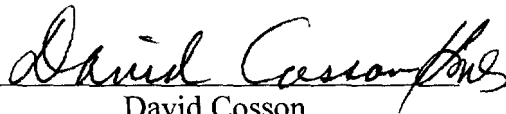
The NANC recommended NECA but included with its recommendation a suggestion for a “neutrality cure” that would require NECA to create an independent board exclusively for the BCA. The Board would have to be broad based with representation from the North American Numbering Plan community and at least one international representative. NTCA believes this recommendation is well intentioned but probably unnecessary. NECA should have the discretion to create an advisory board or oversight council instead of a separate subsidiary. Creation of a separate board just to oversee the BCA will obviously impose additional costs on the process and involve inefficiencies without appreciable public benefits. An advisory council to an independent entity such as the Universal Service Administration Company (“USAC”) NECA proposes to create can as easily cure the neutrality concerns of the various interested parties. Billing and Collection is an administrative function which requires oversight but should not involve the agent in the type of policy decisions which ordinarily invoke neutrality concerns of a high order. An advisory committee is all that is needed in these circumstances. The functioning of the TRS Advisory Council illustrates this point. In view of this, the Commission should quickly approve NECA’s proposal to create a USAC and permit NECA to perform the BCA functions with the oversight of an advisory council.

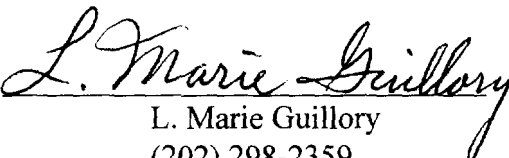
## CONCLUSION

For the above stated reasons, NTCA urges the Commission to appoint NECA as BCA and permit NECA to establish an oversight council to oversee its functions as the BCA.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE  
ASSOCIATION

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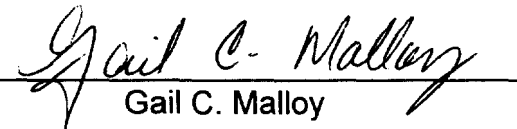
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June 20, 1997

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 92-237 was served on this 20th day of June 1997, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list:

  
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